

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PAMELA HILL,

Plaintiff,

v.

Case No. 1:17-cv-00493-MRB

DSW INC.,

Defendant.

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO RESPOND TO THE COMPLAINT**

Defendant DSW Inc. (“DSW”), pursuant to the Federal Rules of Civil Procedure and with the consent of Plaintiff’s counsel, respectfully requests an extension of time within which to file its response to Plaintiff’s Complaint. In support of this Motion, DSW respectfully states as follows:

1. On or about July 20, 2017, Plaintiff filed a Complaint (ECF No. 1) in this Court.
2. On July 31, 2017, DSW was served with the Summons and the Complaint. Thus, in accordance with the Federal Rules of Civil Procedure, DSW’s response to the Complaint is due on or before August 21, 2017.
3. Plaintiff has not filed an Amended Complaint or any other document which would alter the date by which DSW must respond to the Complaint.
4. Pursuant to Federal Rule of Civil Procedure 6(b), undersigned counsel seeks a 30-day extension of this deadline, up through and including September 20, 2017, to fully research the allegations contained in the Complaint and respond thereto.
5. The requested extension is not sought for the purposes of delay. Plaintiff will suffer no prejudice from the requested extension.

6. Counsel for DSW conferred with counsel for Plaintiff, who does not oppose the relief requested herein.

WHEREFORE, based upon the foregoing, Defendant DSW Inc. respectfully requests that it be granted an extension of time up to and including September 20, 2017, within which to file its response to Plaintiff's Complaint.

LOCAL RULE 7.3(a) CERTIFICATION

Counsel for DSW conferred with counsel for Plaintiff regarding the relief requested herein, and counsel for Plaintiff has agreed to and does not oppose the Motion.

Dated: August 18, 2017

Respectfully submitted,

By: /s/ James M. Doerfler
James M. Doerfler (OH # 59350)
REED SMITH LLP
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
Telephone: (412) 288-3280
Facsimile: (412) 288-3063
Email: jdoerfler@reedsmith.com

Counsel for DSW Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2017 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record.

/s/ James M. Doerfler
James M. Doerfler (OH #59350)